

Exhibit 7

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN McCOLLUM,	\$
STEPHANIE KINGREY, AND	\$
SANDRA McCOLLU,	\$
INDIVIDUALLY AND AS	\$
HEIRS AT LAW TO THE	\$
ESTATE OF LARRY GENE	\$
McCOLLUM,	\$ CIVIL ACTION NO.
Plaintiffs,	\$ 3:12-CV-02037
	\$
VS.	\$
	\$
BRAD LIVINGSTON, JEFF	\$
PRINGLE, RICHARD CLARK,	\$
KAREN TATE, SANDREA	\$
SANDERS, ROBERT EASON,	\$
THE UNIVERSITY OF TEXAS	\$
MEDICAL BRANCH AND THE	\$
TEXAS DEPARTMENT OF	\$
CRIMINAL JUSTICE,	\$
Defendants.	\$

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ORAL AND VIDEOTAPED DEPOSITION OF
WILLIAM L. STEPHENS
VOLUME 1

October 18, 2013

* * * * *

ORAL AND VIDEOTAPED DEPOSITION OF WILLIAM L. STEPHENS, produced as a witness at the instance of the PLAINTIFFS, and duly sworn, was taken in the above-styled and numbered cause on October 18, 2013, from 4:50 p.m. to 8:05 p.m., before Brenda J. Wright, RPR, CSR in and for the State of Texas, reported by machine shorthand, at the Office of the Attorney General, 300 West 15th Street, Suite 1200, Austin,

Stephen McCollum, et al. v.
Brad Livingston, et al.

William L. Stephens
October 18, 2013

<p style="text-align: right;">25</p> <p>1 believe in this situation the officer had a radio. 2 I'm not positive, though. 3 Q. You -- and just to make the record clear. 4 The officer doesn't have a phone on him, he would need 5 to tell someone else to call 911? 6 A. Right. Even our phones on the housing area 7 do not have access to call a number outside the 8 institution. 9 Q. Okay. But you think the officer should have 10 taken that step when he ascertained it was an 11 emergency? 12 A. If he ascertained it was an emergency, then, 13 yes. 14 Q. Okay. We talked with Mr. Thaler some about 15 how policies are made for TDCJ. Do you remember that 16 discussion? 17 A. Yes, sir. 18 Q. I'm going to ask you some questions that we 19 asked Mr. Thaler, because since you're in Mr. Thaler's 20 position now, I just want to see if you have any 21 different understanding than he does or maybe you know 22 or remember something that he didn't. Okay? 23 A. Okay. 24 Q. We talked about whether Mr. Livingston, what 25 his level of involvement is with the policies that are</p>	<p style="text-align: right;">27</p> <p>1 Division, I've had several conversations with 2 Mr. Livingston about different operational type 3 issues. You know, right now, the Prison Rape 4 Elimination Act is a tremendous issue going on in our 5 agency. The Implementation of some current 6 legislation that we're trying to put out is a -- is a 7 tedious task, so I've had conversations with him about 8 those issues. 9 Q. Can you recall any other issues you've 10 talked with Mr. Livingston about besides Prison Rape 11 Elimination Act implementation and the implementation 12 of some new legislation? 13 A. There is issues, yes, sir, I've talked to 14 him about. 15 Q. What else do you remember talking with him 16 about? 17 A. Do you want me to name everything that I've 18 talked to Mr. Livingston about? 19 Q. How -- well, let's -- how often do you talk 20 with Mr. Livingston? 21 A. I would say, daily. 22 Q. Daily. Fair enough. Does he work in the 23 same office as you? 24 A. Excuse me? 25 Q. Does he work in the same physical office</p>
<p style="text-align: right;">26</p> <p>1 made for the Correctional Institutions Division. Do 2 you remember that? 3 A. Yes. 4 Q. And some of the administrative directives or 5 policies that Mr. Livingston has to sign off on and 6 approve. Is that right? 7 A. As I understand it, yes. 8 Q. Okay. Do you know if Mr. Livingston reads 9 those policies before he signs off on them? 10 A. No, I do not know what Mr. Livingston does 11 in this. 12 Q. Has Mr. Livingston ever asked you any 13 questions about one of these policies before his 14 signature -- 15 A. No, sir. 16 Q. Okay. Have you ever consulted with him 17 about a policy before he approves it to tell him, 18 like, you know, Mr. Livingston, this is a new policy 19 we're proposing, this is why we think it's necessary, 20 or anything like that? 21 A. About a policy, no. 22 Q. Okay. When have you talked with 23 Mr. Livingston? 24 A. Well, after taking on this job and becoming 25 a -- the director for the Correctional Institutions</p>	<p style="text-align: right;">28</p> <p>1 as -- 2 A. No, sir, not in the same office. He's down 3 the hallway. 4 Q. Okay. The same office building? 5 A. The same building, that's correct. 6 Q. Have you ever talked with Mr. Livingston 7 about the temperatures inside the housing areas? 8 A. I have not had that conversation with him, 9 no, sir. 10 Q. Have you ever approached him about that? 11 A. No, sir, I have not. 12 Q. You've never told him that you think that's 13 an important issue that you need to talk about with 14 him? 15 A. I have not had the conversation with 16 Mr. Livingston about temperatures in the dorms. 17 Q. Why not? Why haven't you ever talked with 18 him about that? 19 A. Because I feel we are doing a good job of 20 mitigating the circumstances and the -- the effects 21 that the temperature in the dorms has on the 22 offenders. 23 Q. So you -- because you think that you're 24 doing a good job, you don't see any need to involve 25 Mr. Livingston. Is that --</p>

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<p style="text-align: right;">73</p> <p>1 And I don't mean aggressive like a --</p> <p>2 A. Yeah, bad word there. Yes, sir, I believe</p> <p>3 it's reasonable that they should -- they could check</p> <p>4 on him.</p> <p>5 Q. Just wake him up maybe, hey, are you doing</p> <p>6 okay?</p> <p>7 A. I believe that's a reasonable expectation,</p> <p>8 yes, sir.</p> <p>9 Q. Okay. We've had some discussion about -- we</p> <p>10 were calling them respite areas with Mr. Thaler,</p> <p>11 places where the inmates have an opportunity to go to</p> <p>12 where it is air conditioned. Do you recall that?</p> <p>13 A. Yes, sir.</p> <p>14 Q. How are inmates informed about these</p> <p>15 opportunities to go to one of these cooled-off areas?</p> <p>16 A. There should be a posting on the bulletin</p> <p>17 board in the dorm. If -- you know, again, if the</p> <p>18 officer is witnessing stress or the inmate is having</p> <p>19 some difficulty in the -- in his activities and all,</p> <p>20 then should be allowed to go to that area.</p> <p>21 Q. So the --</p> <p>22 A. Request -- request permission from the</p> <p>23 officer, or in some cases we may escort him to our</p> <p>24 infirmary, wherever that may be.</p> <p>25 Q. So the -- there would be either a posting in</p>	<p style="text-align: right;">75</p> <p>1 upon the posting. I will tell you that not all</p> <p>2 postings go -- you know, the commissary will post</p> <p>3 their list every so often of items that we're out of</p> <p>4 stock and things, and those wouldn't be. But I guess</p> <p>5 I would answer that, it's dependent upon the posting.</p> <p>6 Q. Would a posting about protecting prisoners</p> <p>7 from heat be something that a -- the warden should be</p> <p>8 keeping?</p> <p>9 A. I'm not sure that there is a requirement for</p> <p>10 that posting to be filed somewhere. Again, based upon</p> <p>11 my experience as being a warden and my operational</p> <p>12 review sergeant on my unit, I had that individual</p> <p>13 responsible for posting things on the day room, and</p> <p>14 they would keep a copy of what they were posting. But</p> <p>15 I can't tell you there is any clear guidelines out</p> <p>16 there about what they should keep copies of and what</p> <p>17 they should not.</p> <p>18 Q. Okay. Take a look at Exhibit 52 for me,</p> <p>19 Mr. Stephens.</p> <p>20 A. Yes, sir.</p> <p>21 Q. That's a letter that we talked about with</p> <p>22 Mr. Thaler that has Mr. Livingston's signature on it</p> <p>23 to Representative Sylvester Turner. Does that look --</p> <p>24 is that right?</p> <p>25 A. That's correct.</p>
<p style="text-align: right;">74</p> <p>1 the dorm on the bulletin board, or the officer, if</p> <p>2 they noticed somebody looked in distress, they could</p> <p>3 say, hey, do you need to go to cool off?</p> <p>4 A. That is correct.</p> <p>5 Q. Any other ways that an inmate would be</p> <p>6 informed by TDCJ about that opportunity?</p> <p>7 A. At this point, I can't recall any other way.</p> <p>8 Q. How does a posting on the bulletin board get</p> <p>9 approved?</p> <p>10 A. The warden approves postings on the bulletin</p> <p>11 board. Now, there is times, because of maybe a</p> <p>12 systemic issue, the director or the division head,</p> <p>13 because of the -- I guess, the wide significance of it</p> <p>14 that would require it to be posted on the board.</p> <p>15 Q. Generally, like a correctional officer, a</p> <p>16 low level officer, couldn't just put something up on</p> <p>17 the board, though. It should be approved by the</p> <p>18 warden. Is that --</p> <p>19 A. Generally, that doesn't happen. The warden</p> <p>20 approves the posting on the bulletin board.</p> <p>21 Q. And are copies of those postings kept</p> <p>22 anywhere? Like if the warden said, we're going to put</p> <p>23 this posting up about heat, would a copy of that go in</p> <p>24 the file somewhere?</p> <p>25 A. I -- my experience is that it's dependent</p>	<p style="text-align: right;">76</p> <p>1 Q. Were you involved in the drafting of this</p> <p>2 letter?</p> <p>3 A. I don't remember being involved in this</p> <p>4 drafting.</p> <p>5 Q. Do you know -- before today, had you ever</p> <p>6 seen a copy of that letter?</p> <p>7 A. No, sir. And I will say that up until</p> <p>8 getting the job that I have now, I don't think I ever</p> <p>9 drafted a letter for Mr. Livingston.</p> <p>10 Q. Okay. Is that something you do in your</p> <p>11 current position?</p> <p>12 A. I've done one.</p> <p>13 Q. What was that about?</p> <p>14 A. It was -- it was a response to a family</p> <p>15 member, and I think I did such a bad job they won't</p> <p>16 ask me again.</p> <p>17 Q. That's a good way to get out of things in</p> <p>18 the future.</p> <p>19 A. Well, it wasn't on purpose. I tried.</p> <p>20 Q. All right. Let's talk about these directors</p> <p>21 meetings.</p> <p>22 A. Sure.</p> <p>23 Q. You are looking at Exhibit 53. That's the</p> <p>24 meeting from July 2010. Is that right?</p> <p>25 A. That's correct.</p>

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<p style="text-align: right;">113</p> <p>1 you see that, Mr. Stephens?</p> <p>2 A. Yes, sir. I'm sorry. 58?</p> <p>3 Q. Yes, Exhibit 58. Yes. If I could refer you</p> <p>4 to page 649. The first page, I'm sorry.</p> <p>5 A. These start with seven.</p> <p>6 Q. 749.</p> <p>7 A. Okay. All right. 749.</p> <p>8 Q. It looks like you discuss security reviews</p> <p>9 at this meeting and had a handout?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And then on page 750, it looks like you --</p> <p>12 excuse me. It looks like, on page 751, it indicates</p> <p>13 you discussed heat preparations?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Given that this is the March minutes, what</p> <p>16 would it mean that you were discussing heat</p> <p>17 preparations?</p> <p>18 A. Getting ready, preparing for the upcoming</p> <p>19 summer months.</p> <p>20 Q. And what would that include?</p> <p>21 A. Make sure they have sufficient water</p> <p>22 coolers, make sure the fans are in operational order,</p> <p>23 make sure that we're starting to reemphasize training</p> <p>24 and having an awareness out there in the field.</p> <p>25 Q. Anything else?</p>	<p style="text-align: right;">115</p> <p>1 probably was.</p> <p>2 Q. How often does Mr. Livingston attend one of</p> <p>3 these meetings?</p> <p>4 A. Not very often. He has been known to stick</p> <p>5 his head in there, though, and if he -- I don't know.</p> <p>6 Not often. I couldn't guess.</p> <p>7 Q. From your point of view, how involved is</p> <p>8 Mr. Livingston with the day-to-day operations of the</p> <p>9 actual prison units as opposed to the other things</p> <p>10 that TDCJ does?</p> <p>11 A. Well, my experience dealing directly with</p> <p>12 Mr. Livingston has started in the last four months,</p> <p>13 and I can tell you, he is involved.</p> <p>14 Q. Do you ever send e-mails to Mr. Livingston?</p> <p>15 A. I can't think of a time I've sent him an</p> <p>16 e-mail, no, sir.</p> <p>17 Q. I'll refer you to page 760.</p> <p>18 A. Yes, sir.</p> <p>19 Q. Do you see that? Do you see where it says</p> <p>20 Heat-Related Illness in the middle?</p> <p>21 A. Yes, sir.</p> <p>22 Q. On the side there is an asterisk, then it</p> <p>23 says, talk to WS. I assume that's you?</p> <p>24 A. I make that assumption, too. Again, I</p> <p>25 didn't write the note, so...</p>
<p style="text-align: right;">114</p> <p>1 A. I can't think of it right now.</p> <p>2 Q. Okay. You see page 754?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Do you see where it says Heat-Related</p> <p>5 illness at the bottom?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Do you see where it says, talk about every</p> <p>8 month?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Is that, again, part of emphasizing --</p> <p>11 A. I make that assumption, yes, sir. Based</p> <p>12 upon -- I didn't write these notes either.</p> <p>13 Q. And you don't have any direct memory of this</p> <p>14 meeting?</p> <p>15 A. No, sir.</p> <p>16 Q. You see page 757?</p> <p>17 A. Yes, sir.</p> <p>18 Q. You see on that first line all the way on</p> <p>19 the right, it says, B. Livingston?</p> <p>20 A. I see that, yes, sir.</p> <p>21 Q. I assume that is Brad Livingston?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Do you remember if he was at this meeting?</p> <p>24 A. I don't remember if he was at the meeting,</p> <p>25 but my assumption is, based upon these notes, he</p>	<p style="text-align: right;">116</p> <p>1 Q. Do you have any recollection of this</p> <p>2 meeting?</p> <p>3 A. No, sir, no direct recollection.</p> <p>4 Q. Do you remember anybody specifically coming</p> <p>5 up to talk to you after this meeting about heat</p> <p>6 precautions?</p> <p>7 A. No, sir.</p> <p>8 Q. Do you have any recollection why it would</p> <p>9 say, talk to WS, there?</p> <p>10 A. No, sir.</p> <p>11 Q. You would agree that it appears that at this</p> <p>12 meeting there were -- it was discussed that ten men</p> <p>13 had died last year, relating to heat?</p> <p>14 A. I agree.</p> <p>15 Q. Okay. And that the other things that were</p> <p>16 checked -- discussed were fans, training, and wellness</p> <p>17 checks?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Would it be fair to say that around this</p> <p>20 time period was when the change was made to create the</p> <p>21 wellness checks system that we've talked about</p> <p>22 earlier?</p> <p>23 A. I think it -- not -- not being able to</p> <p>24 remember exactly when it happened, I would say,</p> <p>25 generally, around this time, yes, sir.</p>

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<p style="text-align: right;">137</p> <p>1 A. -- and this is just one of them I would look 2 at. 3 Q. That would be one item on your list? 4 A. Yes, sir. 5 Q. Do you have any doubt that it was very hot 6 inside at the Hutchins Unit during the summer? 7 A. No, sir, I don't have any doubt. 8 Q. How about the Gurney Unit, any doubt? 9 A. No, sir, I don't have any doubt. 10 Q. How about the Michael Unit? 11 A. No, sir. 12 Q. The Huntsville Unit? 13 A. No, sir. 14 Q. The Hodge Unit? 15 A. No, sir. 16 Q. The Garza East Unit? 17 A. No, sir. 18 Q. Garza West Unit? 19 A. No, I don't have any. 20 Q. Okay. If -- would you characterize 21 Mr. Livingston as being hands-on with the prison 22 system? 23 A. Yes, sir. I -- yes, sir. I would -- he is 24 a very good leader of this agency. 25 Q. He is very engaged with the problems that</p>	<p style="text-align: right;">139</p> <p>1 A. We have some. 2 Q. Do you know anything about the program that 3 raises pigs? 4 A. No, sir. 5 Q. Okay. Do you know what those pigs are 6 raised for, what the purpose -- 7 A. I assume for the meat. 8 Q. They're raised for slaughter? 9 A. Yes, sir. 10 Q. Is that -- 11 A. I say, I assume. I know we have the packing 12 plant at Michael, I know they slaughter the pigs and 13 then the meat, in turn, goes to our kitchens. 14 Q. You've seen various parts of the system 15 that -- like the packing plant is one part of the 16 system that would process the pigs? 17 A. Sure. And while being the Region II 18 director in Tennessee Colony, there were different 19 places they kept pigs. 20 Q. Were you -- did you ever go to any of those 21 places that kept the pigs? 22 A. I have, yes, sir. 23 Q. Were any of those places climate controlled? 24 A. No, sir. 25 Q. None of the places you visited?</p>
<p style="text-align: right;">138</p> <p>1 the agency is facing. Is that fair? 2 A. I would say he's engaged, yes, sir. 3 Q. If Director Livingston told you to -- that 4 he thought we needed to implement air conditioning in 5 some part of the Hutchins Unit, would you take steps 6 to make that happen? 7 A. I wouldn't be involved in that. 8 Mr. Livingston would actually coordinate the folks on 9 the facilities side of the agency. 10 Q. He would talk to the folks like Mr. Vian and 11 that -- 12 A. Or Mr. Inmon. 13 Q. Mr. Inmon is Mr. Vian's supervisor? 14 A. Yes, sir. 15 Q. Okay. But he would go down through the 16 Facilities Division to make that happen? 17 A. Sure. And probably budget and finance area. 18 Q. If you wanted -- if you decided, 19 hypothetically, that you thought, we really need to 20 air condition parts of the Hutchins Unit, would you 21 take that up to Mr. Livingston, and then if he agreed, 22 it would go back down through the Facilities? 23 A. Yes, sir. That would be my route. 24 Q. Okay. Are you familiar with TDCJ's 25 agricultural program?</p>	<p style="text-align: right;">140</p> <p>1 A. No, sir. 2 Q. Do you know if there are -- 3 A. Well, the packing plant was. 4 Q. The packing plant? 5 A. Yes, sir. But where we actually -- the pigs 6 are raised and whatnot was not. 7 Q. Could there be parts of the system where the 8 pigs are kept in climate controlled conditions? 9 A. I haven't been to every pig farm in every 10 part of the state. I'm sorry. 11 Q. That's fine. 12 A. But I don't know. There could be. 13 Q. If there were media reports that that was 14 true, would you have any reason to dispute that? 15 A. No, sir. 16 Q. Okay. We heard Mr. Thaler talk about the 17 wisdom of the decision to climate control the swine 18 barns but not some of the inmate housing areas. Do 19 you remember that? 20 A. The wisdom? 21 Q. The -- he -- I believe Mr. Thaler testified 22 he thought that that -- those resources could be 23 better spent taking care of the prisoners than the 24 pigs. Do you remember that? 25 A. No, sir, I don't remember that.</p>

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<p style="text-align: right;">145</p> <p>1 Q. Is that Mr. Clark, Jason Clark?</p> <p>2 A. Jason Clark. That's correct.</p> <p>3 Q. Thank you for your time, Mr. Stephens. I</p> <p>4 appreciate you staying. I passed when I promised</p> <p>5 Mr. Garcia that we would be done tonight. Appreciate</p> <p>6 it.</p> <p>7 THE WITNESS: Yes, sir.</p> <p>8 MS. COOGAN: I have no questions for</p> <p>9 Mr. Stephens.</p> <p>10 MR. GARCIA: I have no questions at</p> <p>11 this time.</p> <p>12 MR. ANASTASIDIS: No questions.</p> <p>13 THE VIDEOGRAPHER: That concludes the</p> <p>14 deposition. We're off the record at 8:01 p.m.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">147</p> <p>1 SIGNATURE</p> <p>2</p> <p>3 I, WILLIAM L. STEPHENS, have read the</p> <p>4 foregoing deposition and hereby affix my signature</p> <p>5 that same is true and correct, except as noted above.</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11 JOB NO. 131018BJW</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">146</p> <p>1 CHANGES AND CORRECTIONS</p> <p>2 WILLIAM L. STEPHENS - October 18, 2013 VOLUME 1</p> <p>3 [DISREGARD IF WAIVED]</p> <p>4</p> <p>5 Reason Codes: (1) to clarify the record; (2) to</p> <p>6 conform to the facts; (3) to correct a transcription</p> <p>7 error; (4) other (please explain).</p> <p>8 PAGE/LINE CHANGE REASON CODE</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25 JOB NO. 131018BJW</p>	<p style="text-align: right;">148</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF TEXAS</p> <p>3 DALLAS DIVISION</p> <p>4 STEPHEN McCOLLUM, §</p> <p>5 STEPHANIE KINGREY, AND §</p> <p>6 SANDRA McCOLLU, §</p> <p>7 INDIVIDUALLY AND AS §</p> <p>8 HEIRS AT LAW TO THE §</p> <p>9 ESTATE OF LARRY GENE §</p> <p>10 McCOLLUM, § CIVIL ACTION NO.</p> <p>11 Plaintiffs, § 3:12-CV-02037</p> <p>12</p> <p>13 VS. §</p> <p>14</p> <p>15 BRAD LIVINGSTON, JEFF §</p> <p>16 PRINGLE, RICHARD CLARK, §</p> <p>17 KAREN TATE, SANDREA §</p> <p>18 SANDERS, ROBERT EASON, §</p> <p>19 THE UNIVERSITY OF TEXAS §</p> <p>20 MEDICAL BRANCH AND THE §</p> <p>21 TEXAS DEPARTMENT OF §</p> <p>22 CRIMINAL JUSTICE, §</p> <p>23 Defendants. §</p> <p>24</p> <p>25</p> <p>1 REPORTER'S CERTIFICATION</p> <p>2 ORAL AND VIDEOTAPED DEPOSITION OF</p> <p>3 WILLIAM L. STEPHENS</p> <p>4 VOLUME 1</p> <p>5 October 18, 2013</p> <p>6</p> <p>7 I, BRENDA J. WRIGHT, Certified Shorthand</p> <p>8 Reporter in and for the State of Texas, hereby certify</p> <p>9 to the following:</p> <p>10 That the witness, WILLIAM L. STEPHENS, was duly</p> <p>11 sworn by the officer and that the transcript of the</p> <p>12 oral deposition is a true record of the testimony</p> <p>13 given by the witness;</p> <p>14 I further certify that pursuant to Federal</p> <p>15 Rules of Civil Procedure, Rule 30(e)(1)(A) and (B) as</p>

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William L. Stephens
October 18, 2013

<p style="text-align: right;">149</p> <p>1 well as Rule 30(e)(2) that the signature of the 2 deponent: 3 <u> X </u> was requested by the deponent and/or a 4 party before completion of the deposition and is to be 5 returned within 30 days from date of receipt of the 6 transcript. If returned, the attached Changes and 7 Corrections and Signature pages contain any changes 8 and the reasons therefor; 9 <u> </u> was not requested by the deponent and/or a 10 party before the completion of the deposition. 11 That \$ <u> </u> is the deposition 12 officer's charges for preparing the original 13 deposition transcript and any copies of exhibits, 14 charged to PLAINTIFFS; 15 That pursuant to information given to the 16 deposition officer at the time said testimony as 17 taken, the following includes all parties of record: 18 For the Plaintiffs: 19 Mr. Jeff Edwards 20 THE EDWARDS LAW FIRM 21 The Haehnel Building 22 1101 East 11th Street 23 Austin, Texas 78702 24 512-623-7727/512-623-7729 (fax) 25 jeff@edwards-law.com -and- Mr. Scott Medlock TEXAS CIVIL RIGHTS PROJECT 1405 Montopolis Drive Austin, Texas 78741 512-474-5073/512-474-0726 (fax)</p>	<p style="text-align: right;">151</p> <p>1 the action. 2 Certified to by me this 1ST day of NOVEMBER, 3 2013. 4  5 6 BRENDA J. WRIGHT, Texas CSR No. 1780 7 Expiration Date: 12-31-14 8 WRIGHT WATSON & ASSOCIATES 9 Firm Registration No. 225 10 Expiration Date: 12-31-13 11 3307 Northland Drive 12 Suite 185 13 Austin, Texas 78731 14 512-474-4363/51-474-8802 (fax) 15 www.wrightwatson.com 16 JOB NO. 131018BJW 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">150</p> <p>1 For the Defendants Jeff Pringle, Richard Clark, Karen 2 Tate, Sandrea Sanders, Robert Eason and Texas 3 Department of Criminal Justice: 4 Mr. Bruce R. Garcia 5 Assistant Attorney General 6 OFFICE OF THE ATTORNEY GENERAL OF TEXAS 7 Law Enforcement Defense Division 012 8 Post Office Box 12548 9 300 West 15th Street 10 Austin, Texas 78711-2548 11 512-463-2080/512-495-9139 (fax) 12 bruce.garcia@texasattorneygeneral.gov 13 14 For the Defendants Brad Livingston, William Stephens 15 and Richard Thaler: 16 Mr. Demetri Anastasidis 17 Assistant Attorney General 18 OFFICE OF THE ATTORNEY GENERAL OF TEXAS 19 Law Enforcement Defense Division 012 20 Post Office Box 12548 21 300 West 15th Street 22 Austin, Texas 78711-2548 23 512-463-2153/ 512-495-9139 (fax) 24 demetri.anastasidis@texasattorneygeneral.gov 25 1 For the Defendant University of Texas Medical Branch: 2 Ms. Kim Coogan 3 Assistant Attorney General 4 OFFICE OF THE ATTORNEY GENERAL OF TEXAS 5 Law Enforcement Defense Division 6 Post Office Box 12548 7 Austin, Texas 78711-2548 8 512-463-2080/512-495-9139 (fax) 9 kim.coogan@texasattorneygeneral.gov 10 11 I further certify that I am neither attorney 12 nor counsel for nor related to nor employed by any of 13 the parties to the action in which this deposition is 14 taken; 15 Further, I am not a relative nor an employee of 16 any attorney of record in this cause, nor am I 17 financially or otherwise interested in the outcome of</p>	

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Exhibit 4A